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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIOM APR -5 PM 3: 39 EASTERN DIVISION

UNITED STATES OF AMERICA,) INFORMATION FYELAND
Plaintiff,)
v.	1:19 CR 225
MAHMOUD S. ABUKHALIL,) CASE NO
	Title 21, Section 610(c)(1)(A),
Defendant.	United States Code; Title 33,
	Section $1319(c)(2)(A)$,
) United States Code

The United States Attorney charges:

JUDGE POLSTER

COUNT 1

(Unpermitted Discharges Into A Water of the United States, in violation of 33 U.S.C. § 1319(c)(2)(A))

1. From on or about April 30, 2015, to on or about March 17, 2016, on numerous occasions, in the Northern District of Ohio, Eastern Division, Defendant MAHMOUD ABUKHALIL knowingly discharged a pollutant, namely, blood and other bodily fluids from slaughtered animals, from a point source into a water of the United States, namely Engle Ditch, located in Lorain County and part of the Lake Erie watershed, without a permit issued under Title 33, United States Code, Section 1342.

All in violation of Title 33, United States Code, Section 1319(c)(2)(A).

The United States Attorney further charges:

COUNT 2

(Slaughter of Animals for Commercial Use Without a Permit, in violation of 21 U.S.C. § 610(c)(1)(A))

From on or about April 30, 2015, to on or about March 17, 2016, in the Northern
 District of Ohio, Eastern Division, Defendant MAHMOUD ABUKHALIL slaughtered

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approximately 400 lambs or goats without the benefit of Federal inspection, weighing approximately 25,000 pounds total. Furthermore, on or about April 30, 2015, to on or about March 17, 2016, and other dates, Defendant offered for sale or transportation, transported, and sold the involved 25,000 pounds of non-Federally inspected adulterated lamb food products, in commerce.

All in violation of Title 21, United States Code, Section 610(c)(1)(A).

JUSTIN E. HERDMAN United States Attorney

Bv:

EDWARD F. FÈRAN, Chief

General Crimes Unit